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March 3, 2022

**VIA ECF**

Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Guerin v. Forward Artists NYC, LLC, 1:21-cv-10474-RA

Dear Judge Abrams:

We represent Plaintiff Charles Guerin ("Plaintiff") in the above-captioned case. We write pursuant to Section 1.D of the Court's Individual Rules & Practices to respectfully request that in light of defendant Forward Artists NYC, LLC ("Defendant")'s failure to appear, the initial case management conference scheduled for March 17, 2022, at 10:00 a.m., as well as the 3/3/22 deadline to submit the parties' joint letter and proposed case management plan, be adjourned *sine die*. Plaintiff intends to file a motion for default judgment within 14 days.

(1) the original date of the conference is March 17, 2022 (and deadline to file the joint letter is March 3, 2022);

(2) no previous requests for adjournment or extension have been made;

(3) no previous requests were granted or denied;

(4) Defendant is in default and therefore does not consent to or oppose the requested relief;

No other dates will be impacted by this request.

Respectfully Submitted,

**s/jameshfreeman/**  
James H. Freeman

*Counsel for Plaintiff*

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams  
03/04/2022